STATE OF FLORIDA   )   **AFFIDAVIT**
) ss.
COUNTY OF PALM BEACH)

I, William S. Wiltse, being first duly sworn on oath, hereby depose and say:

1. I am a former police detective for the City of Salem, Oregon. I worked as a police officer in the State of Oregon for the past 18 years, during which time I conducted criminal investigations into the sexual abuse and exploitation of children. I am currently sworn as a reserve deputy sheriff with the Palm Beach County Sheriff's Office in Palm Beach County, Florida.

2. I am the developer of the law enforcement computer application known as "Peer Spectre". This application was created in conjunction with Flint Waters of the Wyoming Division of Criminal Investigations as part of an investigative effort formerly known as Peer Precision. This effort, now known as the Child Protection System (CPS), was developed and is currently maintained by TLO, a private company in Boca Raton, Florida. CPS focuses on the development of software tools to identify computers trading files depicting the sexual abuse of children and training law enforcement officers in their use. In addition to being a developer, I am also a certified instructor in the aforementioned Child Protection System and the current Director of Law Enforcement systems at TLO.

3. The Child Protection System software is only made available to specifically trained law enforcement officers and its use is restricted to only those officers in the performance of official law enforcement activities. The software submits data automatically into law enforcement servers located at TLO and no configuration options exist to prevent this from occurring. Investigators understand other law enforcement officers may use the data generated through their use of CPS software. To distribute this application to untrained and unlicensed persons would be a violation of the terms of use and compromise the training points already delivered to investigators across the country.

4. As part of a basic CPS "peer to peer" course, investigators are taught the process of downloading freely available file-sharing software from the Internet and using that software to locate files depicting child sexual abuse on the Gnutella file-sharing network. This process begins by typing in descriptive text as key words and allowing the free software to conduct a search of the network for files containing those key words. Officers are taught to use search terms, which are known by experienced investigators to return a greater than average number of files depicting the sexual abuse of children. Once offending files have been identified, the Internet Protocol, or IP addresses of the computers sharing those files are recorded and geographically located.

5. Sharing computers are also identified by GUID (Globally Unique Identifier) for select file sharing networks. The GUID is generated automatically by the

file sharing software and is used in the standard operation on its respective network. The value of the GUID is stored by the file sharing software on the target computer in a predefined location and is not directly accessible by any CPS software application.

6. The software created for the Child Protection System was designed to replicate the process taught to investigators in their basic peer-to-peer training. Using a list of known key words, CPS software submits those as search terms on file sharing networks in the same fashion as freely available software tools. The computers present on the these file sharing networks respond to these CPS requests in the same way they respond to any other program capable of operating on those networks. Included in those responses, participating computers provide their IP addresses, which are subsequently logged into the law enforcement database.

7. One of the applications within the Child Protection System software suite is ShareazaLE. Based on the software code of "Shareaza", an open-source multi-network file sharing application, ShareazaLE has been heavily modified by programmers at TLO to assist in the downloading of child abuse file content from investigator-selected target computers. All target computers have been previously identified as offering child abuse material, or "Child Notables" for distribution and records of this activity were available to trained investigators through CPS. ShareazaLE is designed to download content by first connecting directly to the target computer, and then requesting all data for said file(s) exclusively from that computer.

8. All components of the Child Protection System, to include the ShareazaLE application, function within established protocols of the file sharing networks on which they operate. All content received from participating computers is the result of requests sent to these computers using aforementioned protocols. None of the CPS software tools, to include the ShareazaLE application, are capable of placing data on target computers or receiving data beyond that which individual users make publicly available on these networks.

9. The term "Child Notable" is an investigator assigned category for certain file hashes within the Child Protection System. A file hash is an alphanumeric value generated by a mathematical algorithm, used to uniquely identify a file traded on file sharing networks. During training investigators are provided software, which generates hash values for recently located child exploitation files and submits those hash values to CPS databases with a category selected by the investigator. For all submitted hash values the "Child Notable" category designation applies to digital imagery depicting visually pre-pubescent minor children engaged in sexually explicit conduct as defined in 18 U.S.C. 2256(2).

10. Child Protection System software tools are copyrighted computer applications for which the source code has never been distributed. The source code is not distributed with the CPS software that is provided to trained law enforcement officers. Without the source code, it is not possible to authenticate the function of the application or validate its "calibration".

Investigators do not receive the source code for CPS tools as part of their training, but only the applications themselves. Officers are taught how to validate the findings of the CPS system by conducting similar searches on the Gnutella network using freely available software applications.

11. The source code used by the Child Protection System, to include that of ShareazaLE, is not accessible by the use of any of its related applications.
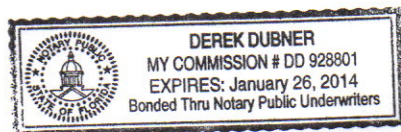
12. The source code used by the Child Protection System, to include that of ShareazaLE, has never been, and will not be, distributed to any law enforcement officer or agency at the municipal, state or federal level. Such a release would compromise both current and future criminal cases where these tools are utilized.

William S. Wiltse

I, _Derek Dubner_ , a Notary Public of the County and State aforesaid, hereby certify that _William Wiltse_ personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

Witness my hand and official seal this the _2nd_ day of _August, 2013_.

DEREK DUBNER
MY COMMISSION # DD 928801
EXPIRES: January 26, 2014
Bonded Thru Notary Public Underwriters

Notary Public